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To: NCIC OPPT/DC/USEPA/US@EPA
cc: Barry Misquitta <MisquittaB@Ferro.com>
Subject: Revised HPV Submission CAS 110-71-4

Dear Administrator Whitman;

On behalf of Ferro Corporation (HPV registration number), I am submitting the revised test plan and robust summaries for 1,2-Dimethoxyethane (CAS number 110-71-4), submitted under the United States Environmental Protection Agency's High Production Volume Chemical Challenge Program. This submission is in response to the Agency's comments on the original submission. The test plan and robust summaries for this material are together in a pdf file. A cover letter detailing the changes is also attached.

This document is being submitted in electronic format (Adobe Acrobat pdf file). If you require additional information or have problems with the electronic document please contact me as a representative of Ferro Corporation by phone (618-539-5280) or email (erauckman@charter.net).

Sincerely,

Elmer Rauckman PhD, DABT
Consulting Toxicologist for Ferro Corporation

CC: Ferro Corporation



- Cov Let Revised.pdf



- MG-TP-RS-Rev-02.pdf

Elmer Rauckman, Ph.D. DABT
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August 27, 2001

Christine Todd Whitman
US Environmental Protection Agency
PO Box 1473
Merrifield VA 22116

Re: Revision of 1,2 Dimethoxyethane HPV Documents.

Via Electronic Submission to Oppt.ncic@epa.gov

Dear Administrator Whitman;

On behalf of Ferro Corporation (HPV registration number _____), I am submitting the attached modified test plan and robust summaries for 1,2-Dimethoxyethane (CAS number 110-71-4), submitted under the United States Environmental Protection Agency's High Production Volume Chemical Challenge Program

Modifications were made in accord with the EPA comments on this document. Specifically, the robust summaries for the fish and daphnia have been significantly enhanced to include the requested data elements and the inputs for the SAR program clearly provided. The surrogate chemical for the fish SAR validation has been changed to a material with a more reliable study and with a Ko/w more in accord with that of the HPV chemical. This provides better support for the low toxicity of the HPV material toward fish. A second surrogate chemical has also been added to the daphnia robust summaries and both the fish and daphnia summaries now contain a detailed rationale for surrogate selection. SAR inputs were also added to the algal study. The corresponding section of the test plan was also revised to accommodate the improved robust summaries.

In response to the comment concerning the reporting of purity data for the test substance, purity information was included in the robust summaries where it was available. Many studies, especially those from the open literature do not include purity data.

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Sincerely,

Elmer Rauckman PhD, DABT
Consulting Toxicologist for Ferro Corporation

CC: Ferro Corporation